

FILED**FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT IN HARRISBURG, PA****IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

MAY 29 2020

PER

DEPUTY CLERK

(1) Jhensy Saillant # 100004671

(Name of Plaintiff) (Inmate Number)

58 Pine Mountain Road

(Address)

(2)

(Name of Plaintiff) (Inmate Number)

McElhattan, PA 17748

(Address)

(Case Number)

(Each named party must be numbered,
and all names must be printed or typed)

vs.

CIVIL COMPLAINT(1) Shon Trusle(2) Simona Flores(3) L. Francis Cissna

(Names of Defendants)

(Each named party must be numbered,
and all names must be printed or typed)TO BE FILED UNDER: 42 U.S.C. § 1983 - STATE OFFICIALS 28 U.S.C. § 1331 - FEDERAL OFFICIALS**I. PREVIOUS LAWSUITS**

- A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

N/A

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? Yes No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? Yes No
- C. If your answer to "B" is Yes:
1. What steps did you take? Filed grievances on all levels.
 2. What was the result? Denied
- D. If your answer to "B" is No, explain why not: N/A

III. DEFENDANTS

- (1) Name of first defendant: Shon Trusle
 Employed as Correctional officer at York County Prison
 Mailing address: 3400 Concord Rd, York PA 17104
- (2) Name of second defendant: Simona Flores
 Employed as Field director at ICE
 Mailing address: 114 North 8 Street Philadelphia PA 19107
- (3) Name of third defendant: L. Francis Cissna
 Employed as Director at ICE
 Mailing address: 114 North 8 Street Philadelphia PA 19107

(List any additional defendants, their employment, and addresses on extra sheets if necessary)

IV. STATEMENT OF CLAIM

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. Shon Trusle use excessive force and slammed me to the floor that cause my right chess bone to move from its original place; cause

Plaintiff right foot bone to show and cause serious back injuries.

2. Simone Flores is the Field Director of ICE and responsible for overseeing that Plaintiff not to be subject to excessive force and cause Shon Trusle to commit the action.
3. L. Francis Cissna is the Director of ICE and responsible for Shon Trusle who work as an ICE Contractor. L. Francis Cissna is liable for the action causes the injuries because of the contract as the person who over see the duty of Shon Trusle. See attached.

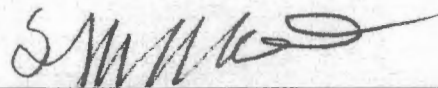
V. RELIEF

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. Requesting a civil trial in the complaint filed against Shon Trusle.
2. Requesting a civil trial in the complaint filed against Simone Flores
3. Requesting a civil trial in the complaint against L. Francis Cissna.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 25 day of May, 20 20.

A handwritten signature in black ink, appearing to be 'S. M. W. K. S.', written over a horizontal line.

(Signature of Plaintiff)

CIVIL COMPLAINT

Date 26th, 2020

(1) On or about December 23rd, 2018 at about 1200 hours to 1300 hours I was standing by the cell door where I was housed during count time at the York County Prison (“YCP”) who correctional officer (“CO”) Shon Trusle come and grabbed my left hand and said let me see your armband.

(2) After I felt CO Shon Trusle grabbed my arm with force. I stretch my arm out and say to CO Shon Trusle “there is my arm if you want to see my armband but you didn’t have to grabbed my arm with such force”.

(3) CO Shon Trusle then told me to go sit on the bench in the hallway outside of the housing unit. I complied with CO Shon Trusle order. CO Shon Trusle the stopped counting and followed me to the hallway where he ordered me to go sit. While CO Shon Trusle following me to the bench at the hallway CO Shon Trusle keeping pushing me in my back while saying, “you do not know who you fucking with, you fucking with the wrong one”. This was unusually because no other officer never stop there count before when telling a detainees to go sit on the bench.

(4) Due to the inflicted force and pain cause by CO Shon Trusle from pushing me in my back I turn around and asked CO Shon Trusle “what is your problem?”.

(5) Before I could make it to the hallway CO Shon Trusle slammed me to the ground face down with extreme force.

(6) As a result, the front part of my right foot hit on the metal bar and cause severe injuries that cause the bone to be sticking out.

(7) A bone in my chest pocking out causing me not able to breath when it was attempted to push back in.

(8) My right leg was bleeding severely and I was immediately taken to medical. Medical treated the injuries as severed while cleaning my injury the nurse stating that, "that is your bone I can see it". The injuries cause the bandage to change very frequently at least once everyday for 30 days. The ankle in my left leg swollen cause severe pain that I could not stand for more than one month every time I tried to stand on my left leg is like the bone break and it move when I stand up, up to this date I can not fully function with my left ankle, I can not run because I have been trying to do exercise on the tread-mill located at Clinton County Correctional Facility "CCCF" where I am housed now.

(9) Up to date, the bone in my chest still never completely into its original place and I am currently feeling chess pain and not able to breath properly since then.

(10) This also cause severe injuries to my back and I have been prescribed pain killer for my back pain, chess and my left leg. Therefore I was then housed in behavior unit ("BAU") for 25 days to concealed the injuries. Therefore I was moved back to general population and CO Shon Trusle continued to harassing me I make many complaint to ICE about

that officer harisson told me he was going to look into the issue and putting me and protecting custody ("PC") which he never did taken no action and I was after interview by two State Police pertaining to the incident because I sent a letter to the District Attorney office ("DA"). See exhibit 1.

Due to my back injury my right leg started going numb, I can not even stand for one hour I have to sit on a chair all day I have been trying to do exercise to see if I will bet better or be able to get to my normal life activities, all that is unsuccessful the exercise make it my back pain worse, sometime if I bent down it hard for me to get back up or when I'm on bed I have to get up slowly and sit down for a little bit before I stand up, I have trying to sweep like cleaning the day area where I am housed after I was done I have to straight to bed due to the pain it cause in my back, is like I am not supposed to do any movement that will do effect on my back I have to stay still, laying down or sit on a chair all day sometime I can hear the bone in my back making nose like cracking when I bent down and try to back up or if I turn my top body in the left or right side.

It been seventeen (18) months now since I have been in pain, I feel like a half man because my body is not the same since I have been assaulted by Correction Officer (CO) shon Trusle.

(11) Up to date I am taking medication and need additional medication and further medical treatment for these severe injuries.

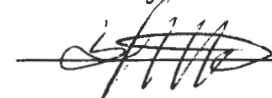
(12) Up to date my right leg get numbed when I stand for a short period of time, thus occurred from the pain in my back traveling through to my right leg.

(13) These injuries cause me not able to hold my urine that led me going to bathroom to urinate 12 times in one hour this happen everyday. Sometime I urinate on myself without knowing or I am in the bathroom urinate when I think I'm done I went to wash my hand I just feel my underwear wet and hot liquid going down my pants

²⁶
Date. 05-26th, 2020

Truly Yours

Jhensy Saillant



²⁶
Date. 05-26th, 2020

Jhensy Saillant

Clinton County Correctional Facility

P.O. Box 419

McElhattan, PA 1774

INMATE NAME
CLINTON COUNTY
CORRECTIONAL FACILITY
P.O. BOX 418
MCLEHATTAN, PA 17748

Therese Saultant
10 000 4671



Legal mail

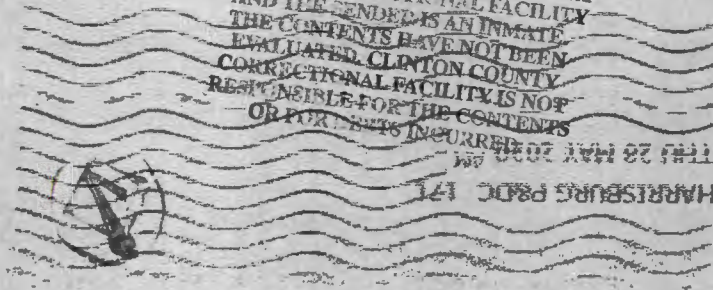
RECEIVED
HARRISBURG, PA

MAY 29 2020

PER

[Signature]
DEPUTY CLERK

INMATE MAIL
THIS CORRESPONDENCE IS FROM A
COUNTY CORRECTIONAL FACILITY
AND THE SENDER IS AN INMATE
THE CONTENTS HAVE NOT BEEN
EVALUATED. CLINTON COUNTY
CORRECTIONAL FACILITY IS NOT
RESPONSIBLE FOR THE CONTENTS
OR FOR FEES INCURRED



*Office of the Clerk
U.S. District Court
228 Walnut Street
P.O. Box 983
Harrisburg, PA 17108*

